

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL ACTION NO.
)	2:11-CR-44-RWS-SSC
SAMUEL J. CRUMP, et al.)	
)	

DEFENDANT'S REQUESTED VOIR DIRE INQUIRY

COMES NOW the Defendant Samuel Crump, by and through undersigned counsel, and moves this Court to propound the following voir dire questions:

A. Personal, Occupational & Educational Background

1. Mr. or Mrs. _____, where do you live?
2. How long have you lived there?
3. Are you married or single?
4. Do you have any children? (If yes, how many; ages)
5. Do you work and what is the nature of your occupation?
6. How long have you worked in this capacity?
7. Please discuss the specific duties and responsibilities of your job.
8. Do you have (or have you ever had) any management or supervisory responsibilities?
If yes, please describe.
9. How many people do you currently supervise? How many people have you supervised in the past?
10. Do your duties include the hiring or firing of other employees?
11. Do your duties include reviewing the job performance of other employees?

12. Do you intend to stay in your current occupation or are you studying/planning to move into some other occupation? What other occupation? Why?

13. What other kinds of work have you done during your lifetime?

Please list all major occupations (including positions held, names of employers, and dates of employment).

14. Have you ever owned your own business? If yes, please describe.

15. Have you ever been self-employed? Please discuss the nature of the business and the reason for its termination.

16. Is your spouse currently employed? If yes, where?

17. What is the nature of your spouse's employment?

18. What is the last school you attended?

19. Did you receive a degree from that institution?

20. Major field of study?

21. Have you ever served in the Armed Forces? (If yes, what branch and dates of service)

22. What are your hobbies, recreational activities or other leisure time interests?

23. Do you belong to any organizations or associations (e.g., social, business, political, religious, community, etc.)? If yes, please explain.

24. Please describe all clubs, civic and/or volunteer groups to which you belong. For each group, please describe the nature of your participation.

B. Prior Jury Service

25. Have you previously served on a jury, civil or criminal?

26. If so, did you actually deliberate to a verdict?

27. Were you the foreperson?

28. Did anything happen during your previous experience as a juror that might affect your decision in the present case?

C. Ability to Follow Court Instructions

29. Is there any reason why you could not serve as a fair and impartial juror in this case?

If yes, please explain.

30. If selected as a juror in this case, you will be asked to judge the conduct of others.

How do you feel about this?

31. Some of the court's instructions on the law may be inconsistent with your own personal attitudes, beliefs and values. How will you handle this situation if it arises?

32. Do you believe that you can set aside your own personal beliefs of what is right or wrong and base your decision on the Court's instructions on the law?

D. Bias, Prejudice and Weight of Testimony

33. Are any of your close friends or family members employed by the state or federal government?

34. Particularly in law enforcement?

35. Could those of you who are government employees maintain impartiality in this case?

36. Do you think that you would give more weight to the testimony of government officers or employees merely because they are government officers or employees?

37. Do you have any relatives or friends who work in law enforcement?

38. Have you, or any relative, been employed by any law enforcement agency? If so, when, where and what was your position?

39. Have you ever had an unpleasant experience with law enforcement?

40. Have you had an experience as a victim or as a relative or close friend of a victim of a crime?

41. Were you satisfied with the way that the police and the courts handled the matter pertaining to Question 40?

42. Do you feel that you possess bias or prejudice with respect to the present case in view of your experience as a victim or being close to a victim of a crime?

43. Have you or any of your close friends or relatives ever been convicted of any crime? (If yes, what crime?)

44. Believe it or not, some people actually judge others by the way they look. Please take a good look at Lawrence Dawson. Is there anything about Mr. Dawson's appearance that would make you believe that he is either guilty or innocent?

E. Nature of Case

45. The Defendant has been charged with violation of 18 USC § 175(a) and 2. for conspiracy with co-defendant Ray Adams to develop and produce and possession of a biological agent Rican. Would the nature of these charges in any way bias or prejudice you for or against the Defendant?

F. Other Issues

46. Do you have any medical problems or disabilities (e.g., vision, hearing, emotional, back pain, etc.) which may affect your service as a juror in this case?

47. Please briefly describe the nature of such medical problems or disabilities, and the reason(s) this could affect your service as a juror.

48. Do you use any appliances or devices (e.g., eyeglasses, hearing aids, back supports) or prescription medications to assist you with these medical problems/disabilities? Please

describe.

49. Is there anything in your background which you think we should know about that could affect your ability to be fair and impartial in this case?

50. The trial is expected to last 1 week. Would serving on this jury be an *extreme* hardship for you? If yes, please explain why.

51. Do any of you have any opinion about snitches or cooperators that would make it difficult to be fair and impartial in this case?

52. Have any of you formed any opinions about either prosecutors or defense attorneys which would affect you in deciding this case?

53. Have you either formed or expressed an opinion as to the guilt or innocence of the defendant at this time?

54. Do you know any of the other prospective jurors?

55. Do you know the following persons: Samuel J. Crump ?

56. Do you know any of the witnesses identified by the Government?

57. This case involves the allegation of a criminal conspiracy. Has any person on this panel ever had a close friend, family member, or themselves been charged with a Federal or State charge of Conspiracy?

58. Has any person on this panel ever had a close friend, family member, or themselves been charged with a Federal or State crime?

59. Does any person on this jury have a friend or relative that works for the Federal Government? Whether in law enforcement or not?

60. Do any of you attend church or any other type of faith based organization on a regular basis?

61. Would any persons on this panel describe themselves as members of a militia or any other quasi-governmental organization?

62. Does anybody feel that, and I want you to be completely honest, because honesty is what this process is all about, and you will not be criticized or harmed by being honest in this Court,... since this case deals with firearm offenses and conspiracy, does any person feel that they could not be completely and totally fair and impartial to both the Defendant and the government in this case.

63. If you do not honestly feel that you can be fair and impartial, please tell us. There is absolutely nothing wrong with stating how you honestly feel about this matter.

64. Does any person feel that because of their life experiences, that they could not be fair and impartial, and listen to the facts and evidence as presented in this court in this case and apply the legal instructions that the judge will give you at the close of this case to the facts and evidence as presented in this Court?

The Defendant would like to reserve the right to ask additional specific questions and general questions to the panel and individual panel members that may arise by necessity from the voir dire of the panel.

Respectfully submitted this _____ day of June, 2013.

SUMMER & SUMMER

/s/ Daniel A. Summer

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This is to certify that I have served a copy of the within and foregoing document generated in Times New Roman 14 point in accordance with LR 5.1C and was electronically filed this day with the Clerk of Court using the CM/ECF system which will automatically send email notification to the following Assistant United States Attorney of record:

Jeff A. Brown
Assistant U.S. Attorney
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This 28th day of June, 2013.

SUMMER & SUMMER



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